

Name and address:

Shanon J. Carson  
 Berger & Montague, P.C.  
 1622 Locust Street  
 Philadelphia, PA 19103

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

COLIN RYAN and CAITLAN LANGE, on behalf of  
 themselves and all others similarly situated,

Plaintiff(s)

v.  
 EXPERIAN HOLDINGS, INC. and EXPERIAN  
 INFORMATION SOLUTIONS, INC.

Defendant(s).

CASE NUMBER

8:15-cv-01595

APPLICATION OF NON-RESIDENT ATTORNEY  
 TO APPEAR IN A SPECIFIC CASE  
 PRO HAC VICE

INSTRUCTIONS FOR APPLICANTS

- (1) Complete Section I of this Application, sign the certification in Section II, and have your designated Local Counsel sign in Section III; **note that electronic signatures are not accepted.** Space to supplement your responses is provided in Section IV. Attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which you are admitted. Scan the completed and signed Application, with attachment(s), to a single Portable Document Format (PDF) file.
- (2) Have your Local Counsel e-file your Application, using the Court's CM/ECF System, and submit a Proposed Order (using Form G-64 ORDER, available from the Court's website).
- (3) Submit payment in the amount of \$325 for each case in which you file an Application. Payment may be submitted at the time of e-filing through Pay.gov, or by delivering payment to the Clerk's Office (Attn: Fiscal) with a copy of the e-filed Application. If your payment is not received within 5 days of the filing of your Application, your Application may be rejected. You will not be allowed to participate as an attorney of record in this case until your payment is received.

SECTION I - INFORMATION

Carson, Shanon J.

Applicant's Name (Last Name, First Name &amp; Middle Initial)

Berger &amp; Montague, P.C.

Firm Name

1622 Locust Street

(215) 875-3000

Telephone Number

(215) 875-4604

Fax Number

Street Address

Philadelphia, PA 19103

City, State, Zip Code

scarson@bm.net

E-Mail Address

**I have been retained to represent the following parties:**

Plaintiffs Colin Ryan and Caitlan Lange

☒ Plaintiff☐ Defendant☐ Other: \_\_\_\_\_☐ Plaintiff☐ Defendant☐ Other: \_\_\_\_\_

Name(s) of Party(ies) Represented

List all courts to which you have been admitted and the current status of your membership:

Name of Court	Date of Admission	Active Member in Good Standing? (if not, please explain)
Supreme Court of Pennsylvania	10/27/2000	Yes

List all cases in which you have applied to this Court for *pro hac vice* status in the previous three years:

<u>Case Number</u>	<u>Title of Action</u>	<u>Date of Application</u>	<u>Granted / Denied?</u>
2:14-cv-02344-JVS-AN	Ramirez, et al v. General Motors LLC	4/23/14	Granted
2:13-cv-04781-DDP-AGR	Maloney v. IndyMac Mortgage Services, et al.	7/19/13	Granted
8:12-cv-02164-CJC-MLG	Kurash, et al v. Hyundai Motor America, et al.	1/4/13	Granted

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

Have you previously registered as a CM/ECF user in the Central District of California ?

☒ Yes ☐ No

If yes, was your CM/ECF User account associated with the e-mail address provided above?

☒ Yes ☐ No:

scarson@bm.net

Previous E-Mail Used (if applicable)

You must be registered for the Court's Case Management/Electronic Case Filing ("CM/ECF") System to be admitted to practice *pro hac vice* in this Court. Submission of this Application will constitute your registration (or re-registration) as a CM/ECF User. If the Court signs an Order granting your Application, you will either be issued a new CM/ECF login and password, or the existing account you identified above will be associated with your case. Pursuant to Local Rule 5-3.2.2, registering as a CM/ECF User is deemed consent, for purposes of Fed. R. Civ. P. 5(b)(2)(E), to electronic service of documents through the CM/ECF System. You have the right to withhold or revoke your consent to electronic service at any time; simply complete and return a Central District Electronic Service Exemption Form (Form G-05, available from the Court's website). If the Court receives an Electronic Service Exemption Form from you, you will no longer receive notice by e-mail when Court orders or other documents are filed in cases in which you are counsel of record; instead, copies of such documents will be sent to you through the mail.

## SECTION II - CERTIFICATION

I declare under penalty of perjury that:

- (1) All of the above information is true and correct.
- (2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.
- (3) I am not currently suspended from and have never been disbarred from practice in any court.
- (4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.
- (5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated 10/23/15

Shanon J. Carson

Applicant's Name (please type or print)

Shanon Carson  
Applicant's Signature

SECTION III - DESIGNATION OF LOCAL COUNSEL

Fraenkel, Stuart R.

*Designee's Name (Last Name, First Name & Middle Initial)*

Nelson & Fraenkel LLP

*Firm Name*

707 Wilshire Blvd., Suite 3600

*Street Address*

Los Angeles, CA 90017

*City, State, Zip Code*

(213) 622-6469

*Telephone Number*

sfraenkel@nflawfirm.com

*E-Mail Address*

173991

*Designee's California State Bar Number*

(213) 622-6019

*Fax Number*

I hereby consent to the foregoing designation as local counsel.

Dated 10/23/15

Stuart R. Fraenkel

*Designee's Name (please type or print)*

Stuart R. Fraenkel

*Designee's Signature*

SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)



**Supreme Court of Pennsylvania**

**CERTIFICATE OF GOOD STANDING**

***Shanon Jude Carson, Esq.***

**DATE OF ADMISSION**

***October 27, 2000***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: October 8, 2015**

A handwritten signature in cursive script, reading "John W. Person Jr.".

**John W. Person Jr., Esq.  
Deputy Prothonotary**